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LAW OFFICES

HENRY E. CRAWFORD

JUN - 5 1997

SUITE 900

1150 CONNECTICUT AVENUE, N.W.

WASHINGTON, D.C. 20036

202-862-4395

Federal Communications Commission  
Office of Secretary

E-Mail: [crawlaw@wizard.net](mailto:crawlaw@wizard.net)

Web: <http://www.wizard.net/~crawlaw>

TELECOPIER NUMBER

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June 5, 1997

**BY HAND DELIVERY**

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222  
Washington, D.C. 20554

Re: 

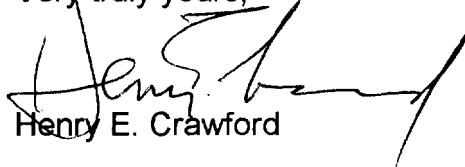
In the Matter of Electronic Filing of Documents in Rulemaking Proceedings
File No.: GC Docket No. 97-113

Dear Mr. Caton:

Transmitted herewith on behalf of The Law Offices of Henry Crawford are an original and six (6) copies of its "Reply Comments of the Law Offices of Henry E. Crawford" as directed to the Commission.

Should any additional information be required, please contact this office.

Very truly yours,

  
Henry E. Crawford

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BEFORE THE  
**FEDERAL COMMUNICATIONS COMMISSION**  
WASHINGTON, D.C.

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*Federal Communications Commission  
Office of Secretary*

In the Matter of

Electronic Filing of Documents  
in Rulemaking Proceedings

GC Docket No. 97-113

To: The Commission

**REPLY COMMENTS OF THE LAW OFFICES OF**  
**HENRY E. CRAWFORD**

Henry E. Crawford

Law Offices of  
Henry E. Crawford  
1150 Connecticut Avenue, N.W.  
Suite 900  
Washington, D.C. 20036  
(202) 862-4395

June 5, 1997

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BEFORE THE  
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*Federal Communications Commission  
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In the Matter of

Electronic Filing of Documents  
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GC Docket No. 97-113

To: The Commission

**REPLY COMMENTS OF THE LAW OFFICES OF**  
**HENRY E. CRAWFORD**

The Law Offices of Henry E. Crawford, respectfully submits its Reply Comments in the above-captioned proceeding. In support thereof, the following is stated:

**I. Introduction**

1. A review of the comments shows that many commentors are in agreement that some sort of security system is required. In our comments, we argued for a registration database system with password protection. Many commentors also expressed proposals similar to those offered by this firm. However, two points need to be addressed at this stage of the proceeding.

**II. Browser Compatibility**

2. In comments, we argued for an open architecture that would allow users to upload, search and download without regard to any particular web browser. Unfortunately, our concern in this regard has been shown to be substantial. After several unsuccessful attempts to upload comments to the site, we learned that the system does not work with Microsoft's Internet Explorer.

Uploading, searching and downloading cannot be performed with Internet Explorer. Electronic filing was only possible by attaching the document to an e-mail directed to the Commission.

3. Limiting access to users of a single web browser defeats the usefulness of the site. Internet Explorer is offered at no cost. Consequently, excluding users of this software would unfairly deprive use of the site to those unable to afford expensive browser software. Also, users unaware of this limitation could find themselves ambushed at a filing deadline and left unable to file timely comments. Since the system does not openly state that users can only use a specific web browser, the cause of the failure would not be clear to the end user.

4. The Commission cannot expect users to maintain multiple browsers on their systems. Browser software has steadily grown in size and maintaining two browsers would present a highly inefficient demand on system resources. Moreover, browser software is presently evolving into full integration with the users operating system. This will further undermine the ability to run multiple web browsers. Finally, the manufactures of browser software often appear before the Commission on a substantive basis; a decision by the Commission to support only one company's software could be perceived as an endorsement of that company. It would be somewhat analogous to the Commission opening up a telephone information line and then limiting it only to the subscribers of a particular common carrier.

5. In sum, if the Commission is to go forward with electronic filing, it must be made accessible to all users, regardless of browser software. If that cannot be accomplished on the web (and there is no reason why it cannot), then a more simplified system would be in order. An electronic BBS with an "800" number could easily handle all the demands of electronic filing using the most generic communications software. While this approach would have its own drawbacks, it is preferable to one that excludes users that do not use particular browser software.

### **III. Document Format**

6. While several commentators noted the need for an open document format, others argued for particular document formats. Among these, ASCII is too simplistic to capture the complexity of most legal filings. No special document formatting is supported and footnotes cannot be easily inserted into documents. Nor should the Commission require filings in Adobe Acrobat. Virtually no firms use that software as a native document creation tool. While documents could be converted into Adobe format, that requires a licensed copy of the software that could cost in the hundreds of dollars. While the PDF format may be useful for viewing documents within a web browser, it should be confined to this alone. Users should still be able to upload and download documents in all modern word processor formats.

**WHEREFORE**, the Law Offices of Henry E. Crawford respectfully submits  
its reply comments herein.

June 5, 1997

Respectfully Submitted,

Law Offices of  
Henry E. Crawford, Esq.  
1150 Connecticut Avenue, N.W.  
Suite 900  
Washington, D.C. 20036  
(202) 862-4395  
E-Mail: [crawlaw@wizard.net](mailto:crawlaw@wizard.net)  
Web: <http://www.wizard.net/~crawlaw>

By:   
Henry E. Crawford